

THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION  
**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

ONE SOUTH STATION

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COMMISSIONER

November 17, 2003

SENT BY E-Mail, and  
First Class U.S. Mail

Arthur M. White  
Bikofsky, White & Benjamin  
435 Worcester Road - P.O. Box 2457  
Framingham, MA 01701

Re: Statewide Towing Association, D.T.E. 03-70

Dear Mr. White:

Enclosed are information requests by the Department of Telecommunications and Energy to Statewide Towing Association in regard to the above-captioned matter. Please submit the Company's responses to the Department by November 25, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel  
Hearing Officer

Enc.  
cc: Service List  
Mary Cottrell, Secretary

FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
STATEWIDE TOWING ASSOCIATION

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Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Statewide Towing Association ("Statewide" or "Company") the following information request(s).

**INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

First Set of Information Requests

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and three copies to Jody M. Stiefel, Hearing Officer.

First Set of Information Requests

- DTE 1-1      Refer to the Association's filing, Exhibit B, at 3-4, note 1. Why is Statewide proposing to change the current status of snow removal tows?
- DTE 1-2      Refer to the Association's filing, Exhibit C, at 4. What was the total number of members who were originally surveyed?
- DTE 1-3      Refer to the Association's filing, Schedule 3, at 3. Please explain, by means of demonstration, the calculation that was used to arrive at the average fuel costs per tow for 1997, 2002 and 2003.